

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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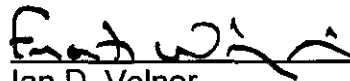
Docket No. MC98-1

PITNEY BOWES REQUEST FOR LEAVE TO SUBMIT
LATE FILED INTERROGATORIES

In accordance with POR MC98-1/11, on November 5, 1998 Witness Garvey filed a response to POIR No. 2 question 4a. under the terms of a protective order issued on November 3, 1998 (POR No. MC98-1/11). Counsel for Pitney Bowes subsequently committed to abide by the protective order conditions and obtained a copy of USPS-LR-16/MC98-1.

By the time that this process was concluded, the deadline for issuing written interrogatories of Postal Service witnesses had expired. Pitney Bowes requests the opportunity to file interrogatories concerning this late-disclosed material, if necessary. We request that interrogatories be permitted following the November 20 appearance of Mr. Garvey, on the notion that the witness's live testimony on unprotected material may obviate the necessity for interrogatories on the protected material.

Respectfully submitted,



Ian D. Volner

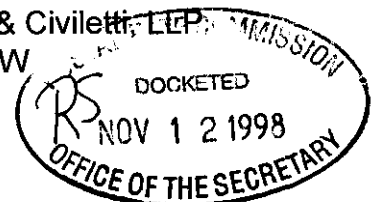
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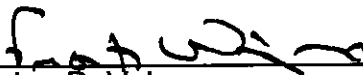
Counsel to Pitney Bowes Inc.

DC1:83409

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: November 12 1998

A handwritten signature in black ink, appearing to read 'Ian D. Volner', written over a horizontal line.

Ian D. Volner